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15 **IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ARIZONA**

17 PAMELA C. SULLIVAN,) C.A. NO. 4:13-cv-01166-BGM
18)
19 Plaintiff,)
20)
21) **JOINT SETTLEMENT
22 STATUS REPORT**
23 v.)
24)
25 BANK OF AMERICA, NATIONAL)
26 ASSOCIATION,)
27)
28 Defendant.)
29)

30 Plaintiff Pamela C. Sullivan (“PCS”), by and through JERRY S. SMITH, PLLC, her
31 undersigned attorney of record, and Defendant Bank of America, National Association (“BOA”),
32 by and through Teri L. Danish, of McGUIREWOODS, LLP, its undersigned attorney of record,
33 submit this Joint Settlement Status Report, pursuant to the Scheduling Order filed January 29,
34 2014, Dkt. #24, Order G:

35 PCS submitted a written settlement proposal to BOA on May 2, 2014, which BOA has
36 rejected, without any counter-offer. The parties have now completed discovery and the
37 discovery period has closed. Plaintiff filed a formal motion to compel, which has been fully
38

1 briefed by both parties (Dkt. #72, 73, and 74) and is currently pending before the Court. BOA
2 timely filed a motion for summary judgment (Dkt. #75; 76), which is also pending before the
3 Court. Per Plaintiff's request, the parties filed a joint stipulation (Dkt. #78) to extend Plaintiff's
4 deadline to respond to Defendant's motion for summary judgment until thirty (30) days after the
5 Court has ruled on Plaintiff's motion to compel

6 Neither party requests a settlement conference or mediation at this time.

7 Respectfully submitted this 19th day of January 2016.

8 JERRY S. SMITH, PLLC

9
10 By: /s/ Jerry S. Smith (w/permission)
JERRY S. SMITH, Attorney for Plaintiff

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12 MC GUIREWOODS LLP

13 By: /s/ Teri L. Danish
TERI L. DANISH, Attorney for Defendant

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15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on January 19, 2016, the foregoing document was duly served in
17 accordance with the provisions of Rule 5 of the Federal Rules of Civil Procedure.

18
19 By: /s/ Teri L. Danish
TERI L. DANISH